

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CR 11-87 RHK/JJK

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

v.

1. JULIAN OKEAYAINNEH,  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh,

(18 U.S.C. § 2)  
(18 U.S.C. § 1028)  
(18 U.S.C. § 1028A)  
(18 U.S.C. § 1341)  
(18 U.S.C. § 1343)  
(18 U.S.C. § 1344)  
(18 U.S.C. § 1349)  
(18 U.S.C. § 1956(h))

Identities assumed of real people:

- a/k/a K.M.,
- a/k/a W.H.,
- a/k/a A.C.,
- a/k/a D.T.,
- a/k/a B.M.,
- a/k/a P.J.,
- a/k/a M.E.,
- a/k/a D.T.,
- a/k/a J.M.,
- a/k/a L.V.,
- a/k/a S.F.,
- a/k/a M.W.E.,
- a/k/a S.S.,
- a/k/a G.R.,
- a/k/a K.B.,
- a/k/a G.L.,
- a/k/a A.M.,
- a/k/a R.T.,
- a/k/a L.D.,
- a/k/a D.M.,
- a/k/a G.L.,
- a/k/a L.D.,
- a/k/a D.M.,
- a/k/a G.L.,
- a/k/a A.N.,
- a/k/a S.N.,
- a/k/a M.C.,
- a/k/a D.C.,

2. OLADIPO SOWUNMI COKER,  
a/k/a Oladipo Sawummi Coker,  
a/k/a Aron Meshan,

SCANNED

MAR 10 2011

U.S. DISTRICT COURT ST. PAUL

FILED MAR 08 2011  
RICHARD D. SLETTEN, CLERK  
JUDGMENT ENTD  
DEPUTY CLERK

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- |     |                                    |   |
|-----|------------------------------------|---|
|     | a/k/a Dipo,                        | ) |
|     | a/k/a Dupo,                        | ) |
|     | a/k/a Debo,                        | ) |
|     | a/k/a Depo,                        | ) |
|     | a/k/a Deepo,                       | ) |
|     | a/k/a D,                           | ) |
|     | a/k/a Dee,                         | ) |
|     |                                    | ) |
| 3.  | CHARLES AMANKWAH AKUFFO,           | ) |
|     | a/k/a Charles Amankwah,            | ) |
|     |                                    | ) |
| 4.  | NANA OSEI-TUTU,                    | ) |
|     |                                    | ) |
| 5.  | FAWSIYO HASSAN FARAH,              | ) |
|     |                                    | ) |
| 6.  | FATA LEETA SARNOR DAVID,           | ) |
|     |                                    | ) |
| 7.  | ADETOKUNBO OLUBUNMI ADEJUMO,       | ) |
|     | a/k/a Tokunbo,                     | ) |
|     | a/k/a Malik,                       | ) |
|     | a/k/a Tods,                        | ) |
|     | a/k/a T,                           | ) |
|     | a/k/a D,                           | ) |
|     |                                    | ) |
| 8.  | JUDE OBIRA OKAFOR,                 | ) |
|     |                                    | ) |
| 9.  | OLUGBENGA TEMIDAGO ADENIRAN,       | ) |
|     | a/k/a Olugbenga Temidayo Adeniran, | ) |
|     | a/k/a Dennis Lok,                  | ) |
|     | a/k/a Dayo Olugbega,               | ) |
|     | a/k/a Andre T. Andeiran,           | ) |
|     | a/k/a Andeniran T. Dayo,           | ) |
|     | a/k/a Oluwafemi Olarewaju Osibodu, | ) |
|     | a/k/a Dayo,                        | ) |
|     | a/k/a Dre,                         | ) |
|     |                                    | ) |
| 10. | JONATHAN SIE EARLEY,               | ) |
|     | a/k/a Joe Wilson,                  | ) |
|     | a/k/a Joe Venni Wilson Jr.,        | ) |
|     |                                    | ) |
| 11. | CHARLES TUBMAN DWAMINA, and        | ) |
|     |                                    | ) |



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- f. JP Morgan Chase Bank;
- g. TCF Bank;
- h. US Bank;
- i. Wachovia Bank;
- j. Washington Mutual; and
- k. Wells Fargo Bank

(hereinafter referred to as the "Financial Institutions").

3. At all times relevant to this indictment:

a. Defendant Julian Okeayainneh resided in the State of California and provided participants in the fraud scheme with stolen means of identification and bank account information which were used to commit fraud against Financial Institutions; "means of identification," as used in this indictment, means any name or number that may be used, alone or in conjunction with any other information to identify a specific individual;

b. Defendant Oladipo Sownmi Coker resided in the State of Minnesota and recruited individuals to assume stolen identities of other persons to create fraudulent bank and credit card accounts and to conduct fraudulent financial transactions;

c. Defendant Charles Amankwah Akuffo resided in the State of Minnesota and assisted with the execution of fraudulent transactions at Financial Institutions;

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d. Defendant Nana Osei-Tutu resided in the State of Minnesota, was employed as a Personal Banker, and assisted with the execution of fraudulent transactions at Financial Institutions;

e. Defendant Fawsiyo Hassan Farah resided in the State of Minnesota, was employed as a Personal Banker and a Branch Manager, and assisted with the execution of fraudulent transactions at Financial Institutions;

f. Defendant Fata Leeta Sarnor David resided in the State of Minnesota, was employed as a Personal Banker, and assisted with the execution of fraudulent transactions at Financial Institutions;

g. Defendant Adetokunbo Olubunmi Adejumo resided in the State of Minnesota and assisted with the execution of fraudulent transactions at Financial Institutions;

h. Defendant Jude Obira Okafor resided in the State of Minnesota and assisted with the execution of fraudulent transactions at Financial Institutions;

j. Defendant Olugeny Temidago Adeniran resided in the State of New York and assisted with the execution of fraudulent transactions at Financial Institutions;

k. Defendant Jonathan Sie Earley resided in the State of Minnesota, possessed and used means of identification of others, and assisted with the execution of fraudulent transactions at Financial

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Institutions;

l. Defendant Charles Tubman Dwamina resided in the State of Minnesota, was employed as a Personal Banker, and assisted with the execution of fraudulent transactions at Financial Institutions; and

m. Defendant Sundayga Dexter Roberts resided in the State of Minnesota, was employed as a Personal Banker, and assisted with the execution of fraudulent transactions at Financial Institutions.

**COUNT 1**

(Bank Fraud Conspiracy)

4. The grand jury incorporates paragraphs 1 through 3 as if fully set forth herein.

5. From in or about 2006 through in or about March 2011, in the State and District of Minnesota and elsewhere, the defendants,

**JULIAN OKEAYAINNEH,**  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh,  
**OLADIPO SOWUNMI COKER,**  
a/k/a Oladipo Sawummi Coker,  
a/k/a Aron Meshan,  
a/k/a Dipo,  
a/k/a Dupo,  
a/k/a Debo,  
a/k/a Depo,  
a/k/a Deepo,  
a/k/a D,  
a/k/a Dee,

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**CHARLES AMANKWAH AKUFFO,**  
a/k/a Charles Amankwah,  
**NANA OSEI-TUTU,**  
**FAWSIYO HASSAN FARAH,**  
**FATA LEETA SARNOR DAVID,**  
**ADETOKUNBO OLUBUNMI ADEJUMO,**  
a/k/a Tokunbo,  
a/k/a Malik,  
a/k/a Tods,  
a/k/a T,  
a/k/a D,  
**JUDE OBIRA OKAFOR,**  
**OLUGENYA TEMIDAGO ADENIRAN,**  
a/k/a Olugbenga Temidayo Adeniran,  
a/k/a Dennis Lok,  
a/k/a Dayo Olugbega,  
a/k/a Andre T. Andeiran,  
a/k/a Andeniran T. Dayo,  
a/k/a Oluwafemi Olarewaju Osibodu,  
a/k/a Dayo,  
a/k/a Dre,  
**JONATHAN SIE EARLEY,**  
a/k/a Joe Wilson,  
a/k/a Joe Venni Wilson, Jr.,  
**CHARLES TUBMAN DWAMINA, and**  
**SUNDAYGA DEXTER ROBERTS,**

did knowingly combine, conspire, confederate and agree with one or more other defendants and with others known and unknown to the grand jury, to execute and attempt to execute a scheme and artifice to defraud the Financial Institutions, and to obtain by means of material false and fraudulent pretenses and representations, monies and funds owned by and under the custody and control of the Financial Institutions, in violation of Title 18, United States Code, Section 1344.

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**Purpose**

6. The purpose of the scheme was to obtain and use means of identification of other persons to create false bank and credit card accounts; to recruit people to assume the identities of other persons and conduct fraudulent transactions at Financial Institutions and businesses; to recruit employees of the Financial Institutions to access bank information and assist with the execution of fraudulent transactions; and to obtain money and merchandise through the use of fraudulently obtained bank account information, credit cards and counterfeit checks. Through this scheme the defendants intended to defraud Financial Institutions of more than \$10 million.

**Manner and Means**

7. To carry out the conspiracy, the defendants, together with others known and unknown to the grand jury:

a. Fraudulently obtained the means of identification of victims in the State of Minnesota and elsewhere;

b. Opened bank accounts using false or stolen means of identification to fraudulently obtain funds of the victims in the State of Minnesota and elsewhere;

c. Stole checks from businesses in the State of Minnesota and elsewhere;

d. Deposited stolen business checks into fraudulently



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created bank accounts in the State of Minnesota and elsewhere, and thereafter withdrew the funds;

e. Used victims' means of identification to fraudulently obtain credit card accounts at Financial Institutions in the State of Minnesota and elsewhere;

f. Fraudulently withdrew funds from credit card accounts in the State of Minnesota and elsewhere;

g. Fraudulently obtained bank account and bank card account information of victims in the State of Minnesota and elsewhere, including information regarding victims' Home Equity Lines of Credit ("HELOC"), which the defendants used to fraudulently transfer funds from the victims' accounts to accounts controlled by the defendants without the victims' knowledge or authorization;

h. Recruited and transported conspirators, in the State of Minnesota and elsewhere, to conduct fraudulent bank transactions, including deposits and withdrawals at Financial Institutions and businesses using victims' means of identification;

i. Recruited Financial Institution employees, in the State of Minnesota and elsewhere, to fraudulently access and obtain customer information and to assist with the execution of fraudulent bank transactions;

j. Through these manner and means, the defendants

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conspired to obtain and attempted to obtain well in excess of \$10 million in fraud proceeds through acts committed by the defendants and other conspirators in Minnesota, California, Iowa, Massachusetts, Rhode Island, Wisconsin, Arizona, Nevada, New York, Texas and elsewhere.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-28  
(Bank Fraud)

8. The grand jury incorporates paragraphs 1 through 7 as if fully set forth herein.

9. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendants, as named below in each count, aided and abetted by each other and by others known and unknown to the grand jury, having devised the scheme and artifice to defraud Financial Institutions, and to obtain the monies and funds owned by and under the custody and control of the Financial Institutions, by means of material false and fraudulent pretenses, representations and promises, as described in paragraphs 6 and 7 above, did knowingly execute and attempt to execute the scheme and artifice as follows:

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
2	ROBERTS EARLEY	2/23/06 - 3/14/06	Wells Fargo Bank	Opened accounts ending in XXXX3171 and XXXX0085 using the identity of T.J.F. and caused transfers from the HELOC of T.J.F. in the amount of \$12,000
3	ADEJUMO	10/03/06 - 12/14/06	Guaranty Bank	Caused the withdrawal of in excess of \$19,500 from fraudulently opened account ending in XXXX5516 in which a stolen check from N.B.C. Studios for \$149,377 was deposited
4	OKEAYAINNEH COKER AKUFFO FARAH OKAFOR	11/17/09	Wells Fargo Bank	Opened bank accounts ending in XXXX7010 and XXXX5854 using the identity of D.B. knowing the true identity of the account holder was not D.B.
5	OKEAYAINNEH COKER AKUFFO OKAFOR	12/08/09	Wells Fargo Bank	Caused unauthorized wire transfers from S.S. HELOC account in the amount of \$49,500 into an account ending in XXXX9855 and \$45,000 into an account ending in XXXX9855
6	OKEAYAINNEH COKER AKUFFO DAVID EARLEY	12/09/09 - 12/10/09	Wells Fargo Bank	Withdrew and cashing of cashier's checks from S.S. bank account ending in XXXX9855 in the amount of \$19,500
7	OKEAYAINNEH COKER AKUFFO TUTU OKAFOR	11/19/09	US Bank	Opened bank account in stolen identity of D.B ending in XXXX3692 and M.S. ending in XXX9727

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
8	OKEAYAINNEH COKER	05/10/10 - 5/21/10	US Bank	Deposited altered payee check from The H. Hackney Co. dated 5/7/10, for \$36,838 and subsequent withdrawal POS transactions, to and from accounts ending in XXXX9463 and XXXX9089
9	OKEAYAINNEH COKER	10/19/10	Associated Bank	Deposited altered payee check from White Rose Food, dated 10/7/10, for \$107,018 into account ending in XXXX8223 using stolen identity of J.B.
10	OKEAYAINNEH COKER	10/29/10 - 11/03/10	Associated Bank	Withdrew \$75,000 of proceeds, from deposit of altered White Rose Food check, in increments under \$10,000 from accounts ending in XXXX8223 and XXXX1620
11	OKEAYAINNEH COKER	11/02/10	TCF Bank	Deposited altered Payee check from Dominican University, dated 10/12/10, for \$37,890 into account ending in XXXX4781 using stolen identity of J.B.
12	OKEAYAINNEH COKER	11/12/10- 11/18/10	TCF Bank	Withdrew \$51,800 of proceeds from deposit of altered Dominican University and transfers from other TCF Bank account, in increments under \$10,000 from an account ending in XXXX4781
13	OKEAYAINNEH COKER	11/04/10	TCF Bank	Deposited altered payee check from Chase Home Finance, dated 10/06/10, for \$23,043 into account ending in XXXX4779 using stolen identity of J.B.

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
14	OKEAYAINNEH COKER	11/12/10- 11/23/10	TCF Bank	Withdrew \$37,700 of proceeds from deposit of altered Chase Home Finance check and transfer from another TCF Bank, in increments under \$10,000 from an account ending in XXXX4779
15	OKEAYAINNEH COKER	11/18/10	TCF Bank	Deposited altered payee check from State Farm Check, dated 10/20/10, for \$53,437 into account ending in XXXX4780 using stolen identity of J.B.
16	OKEAYAINNEH COKER	11/12/10- 11/23/10	TCF Bank	Withdrew \$25,500 of proceeds, from deposit of altered State Farm Check, in increments under \$10,000 from an account ending in XXXX4780
17	OKEAYAINNEH COKER	12/01/10- 12/08/10	Associated Bank	Deposited alerted payee check from International Food Products, dated 11/18/10, for \$124,811, into account ending in XXXX5740 using stolen identity of L.H.
18	EARLEY DWAMINA	12/7/10 - 12/22/10	Associated Bank	Opened a bank account ending in XXXX3629 with an identity that was represented to be stolen
19	EARLEY ROBERTS	2/14/10 - 4/2/10	Associated Bank	Sold customer bank account information of W.S., B.W.E., and M.A.C.M.H.P. regarding accounts ending in XXXX2702, XXXX7670, XXXX7336, XXXX8003
20	ADEJUMO	11/14/09- 11/30/09	Chase Bank	Caused the use of Chase Visa Card ending in XXXX1977 in the name of J.A. to conduct cash advances in the amount of \$17,800
21	ADENIRAN	11/23/09- 11/25/09	Chase Bank	Used Chase Visa Card ending in XXXX3017 in the name of D.G.B. to conduct cash advances in the amount of \$60,000 and purchase gift cards in the amount of \$3,012

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
22	ADENIRAN	11/25/09-12/01/09	Chase Bank	Used Chase Visa Card ending in XXXX3651 in the name of B.B. to conduct cash advances in the amount of \$29,000
23	ADENIRAN	12/12/09-12/14/09	Chase Bank	Used Chase Visa Card ending in XXXX9646 in the name of J.O. to purchase gift cards in the amount of \$12,656 and cash advances of \$10,500
24	ADEJUMO	12/2/09-12/3/09	Chase Bank	Caused the use of Chase Visa Card ending in XXXX9968 in the name of R.R.K. to conduct cash advances in the amount of \$42,000
25	ADENIRAN	12/16/09-12/18/09	Chase Bank	Used Chase Visa Card ending in XXXX5636 in the name of A.D. to conduct cash advances in the amount of \$18,000 and gift card purchases in the amount of \$1,508
26	OKEAYAINNEH COKER	11/24/10-11/30/10	Chase Bank	Caused the use of Chase Visa Card ending in XXXX9836 in the name of L.H. to conduct cash advances and POS transactions in the amount of \$34,000
27	EARLEY	12/17/10	Associated Bank	Provided the means of identification of E.H.F, and E.C.D. with the intent to commit fraud regarding accounts ending in XXXX7665 and XXXX5130
28	ADEJUMO	12/23/09-12/24/09	Chase Bank	Caused the use of Chase Visa Card ending in XXXX8742 in the name of S.P.S. to purchase gift cards in the amount of \$51,435

All in violation of Title 18, United States Code, Sections 1344  
and 2.

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**COUNTS 29-39**

(Mail Fraud)

10. The grand jury incorporates paragraphs 1 through 9 as if fully set forth herein.

11. On or about the date set forth below, in the State and District of Minnesota and elsewhere, the defendants, as named below in each count, aided and abetted by each other and by others known and unknown to the grand jury, having devised the scheme and artifice to defraud Financial Institutions, and to obtain the monies and funds owned by and under the custody and control of the Financial Institutions, by means of material false and fraudulent pretenses, representations and promises, as described in paragraphs 6 and 7 above, did knowingly cause to be sent, delivered, and moved by the United States Postal Service and commercial interstate carrier, according to the directions thereon, the items described below:

Count	Defendant(s)	Date (on or about)	Mailings
29	COKER ADEJUMO ADENIRAN OKAFOR	11/14/2009	Credit card in the victim name of J.A., account ending in xxxx1977
30	COKER ADENIRAN	11/17/2009	Credit card in the victim name of D.B., account ending in xxxx3017

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Count	Defendant(s)	Date (on or about)	Mailings
31	COKER ADEJUMO ADENIRAN	11/30/2009	Credit card in victim name of R.K., account ending in xxxx9968
32	OKEAYAINNEH COKER	3/01/10	Passport photo of A.G.
33	COKER	8/10/10	Replacement American Express card, account ending in xxx2003, in victim name J.T.G
34	OKEAYAINNEH COKER	10/19/10	Altered payee check from White Rose Food, dated 10/7/10, for \$107,018
35	OKEAYAINNEH COKER	11/02/10	Altered payee check from Dominican University, dated 10/12/10, for \$37,890.99
36	OKEAYAINNEH COKER	11/04/10	Altered payee check from Chase Home Finance, dated 10/06/10, for \$23,043
37	ADEJUMO	12/16/09	Credit card in the victim name of S.P.S., account ending in xxxx8742
38	OKEAYAINNEH COKER	11/18/10	Altered payee check from State Farm Check, dated 10/20/10, for \$53,437
39	OKEAYAINNEH COKER	12/01/10 - 12/08/10	Altered payee check from International Food Products, dated 11/18/10 for \$124,811

All in violation of Title 18, United States Code, Sections 1341 and 2.

**COUNTS 40-41**  
(Wire Fraud)

12. The grand jury incorporates paragraphs 1 through 11 as if



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fully set forth herein.

13. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendant,

**JULIAN OKEAYAINNEH,**  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh,

aiding and abetting and being aided and abetted by others known and unknown to the grand jury, having devised the scheme and artifice to defraud Financial Institutions, and to obtain the monies and funds owned by and under the custody and control of the Financial Institutions, by means of material false and fraudulent pretenses, representations and promises, as described in paragraphs 6 and 7 above, did execute and attempt to execute the scheme and artifice, by knowingly transmitting and causing to be transmitted by means of wire communications in interstate commerce, certain writings, signs, signals and sounds, as follows:

Count	Date (on or about)	Financial Institution	Wire
40	11/14/06	US Bank	Wire from California to Minnesota related to using identity of S.K. to deposit a stolen check in the amount of \$66,983, into an account ending in XXX7563

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Count	Date (on or about)	Financial Institution	Wire
41	09/29/09	US Bank	Wire from California to Minnesota related to using the identity of J.T., to deposit a stolen check in the amount of \$74,430 into an account ending in XXX0271

All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNTS 42-55**  
(Aggravated Identity Theft)

14. On or about the dates set forth below, in the State and District of Minnesota and elsewhere, the defendants, as named below in each count, aided and abetted by each other and by others known and unknown to the grand jury, did knowingly possess and use, without lawful authority, a means of identification of another person, as alleged in each count below, during and in relation to the commission of a felony violation of Bank Fraud, Mail Fraud and Wire Fraud:

Count	Defendant(s)	Date (on or about)	Financial Institution	Description
42	ROBERTS EARLEY	2/22/06- 3/14/06	Wells Fargo Bank	Unauthorized use of means of identification of victim T.J.F., opening accounts ending in XXXX3171 and XXXX0085 causing transfers from the HELOC of T.J.F. in the amount of \$12,000

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
43	OKEAYAINNEH COKER AKUFFO FARAH OKAFOR	11/07/09- 12/22/09	Wells Fargo Bank	Unauthorized use of means of identification of victim D.B., opening bank accounts ending in XXXX7010 and XXXX5854
44	OKEAYAINNEH COKER AKUFFO OKAFOR DAVID EARLEY	11/07/09- 12/10/09	Wells Fargo Bank	Unauthorized use of means of identification of victim S.S., withdrawal and cashing of cashier's checks from the account ending in XXXX9855 in the amount of \$19,500
45	COKER	8/10/10	American Express	Unauthorized use of means of identification of victims J.T.G., American Express card, account ending in xxx2003
46	OKEAYAINNEH COKER AKUFFO TUTU	11/19/09 - 12/14/09	US Bank	Unauthorized use of means of identification of victim M.S., opening account ending in XXXX9727
47	OKEAYAINNEH COKER	10/29/10- 11/03/10	Associated Bank	Unauthorized use of means of identification of victim J.B., withdrawal of \$75,000 from accounts ending in XXXX8223 and XXXX1620
48	OKEAYAINNEH COKER	12/01/10	Associated Bank	Unauthorized use of means of identification of victim L.H., opening account ending in XXXX5740
49	ADEJUMO	11/14/09- 11/30/09	Chase Bank	Unauthorized use of means of identification of victim J.A., using Chase Visa Card ending in XXXX1977 to conduct cash advances in the amount of \$17,800
50	ADENIRAN	11/23/09- 11/25/09	Chase Bank	Unauthorized use of means of identification of victim D.G.B., using Chase Visa Card ending in XXXX3017 to conduct cash advances in the amount of \$60,000 and purchase gift cards in the amount of \$3,012

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Count	Defendant(s)	Date (on or about)	Financial Institution	Description
51	ADENIRAN	11/25/09-12/01/09	Chase Bank	Unauthorized use of means of identification of victim B.B., using Chase Visa Card ending in XXXX3651 in the name to conduct cash advances in the amount of \$29,000
52	ADENIRAN	12/12/09-12/14/09	Chase Bank	Unauthorized use of means of identification of victim J.O., using Chase Visa Card ending in XXXX9646 to purchase gift cards in the amount of \$12,656 and cash advances of \$10,500
53	ADEJUMO	12/2/09-12/3/09	Chase Bank	Unauthorized use of means of identification of victim R.R.K., using Chase Visa Card ending in XXXX9968 to conduct cash advances in the amount of \$42,000
54	ADENIRAN	12/16/09-12/18/09	Chase Bank	Unauthorized use of means of identification of victim A.D., using Chase Visa Card ending in XXXX5636 to conduct cash advances in the amount of \$18,000 and gift card purchases in the amount of \$1,508
55	ADEJUMO	12/23/09-12/24/09	Chase Bank	Unauthorized use of means of identification of victim S.P.S., using Chase Visa Card ending in XXXX8742 o purchase gift cards in the amount of \$51,435

All in violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT 56**  
(Money Laundering Conspiracy)

15. From in or about 2006 through in or about March 2011, in

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the State and District of Minnesota and elsewhere, the defendants,

**JULIAN OKEAYAINNEH,**  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh, and  
**OLADIPO SOWUNMI COKER,**  
a/k/a Oladipo Sawummi Coker,  
a/k/a Aron Meshan,  
a/k/a Dipo,  
a/k/a Dupo,  
a/k/a Debo,  
a/k/a Depo,  
a/k/a Deepo,  
a/k/a D,  
a/k/a Dee,

did knowingly combine, conspire, confederate and agree with each other and with others known and unknown to the grand jury, to conduct and attempt to conduct financial transactions affecting interstate commerce, namely transfers of funds, which transactions involved proceeds of specified unlawful activity, that is, bank fraud, knowing that the property involved in the financial transactions represented the proceeds of some form of unlawful activity and knowing that the transactions were designed in whole and in part (a) to conceal and disguise the nature, source, ownership and control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and (b) to avoid a transaction recording requirement under State or Federal law, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

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All in violation of Title 18, United States Code, Section 1956(h).

COUNT 57

(Trafficking in False Authentication Features)

16. From in or about 2006, through in or about December 17, 2010, in the State and District of Minnesota and elsewhere, the defendant,

JULIAN OKEAYAINNEH,  
a/k/a Julian Nosa Inneh,  
a/k/a Julius Inneh,  
a/k/a J.J.,  
a/k/a Julian Okeaya-Inneh,

aiding and abetting and being aided and abetted by others known and unknown to the grand jury, did knowingly traffic in false and actual authentication features for use in false authentication documents, document-making implements and means of identification, in and affecting interstate commerce, without lawful authority, to wit, a means of identification of another person; all in violation of Title 18, United States Code, Sections 1028(a)(8); 1028(b)(1); and 2.

FORFEITURE ALLEGATIONS

Counts 1-57 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures.

If convicted of any of Counts 1 through 28, the convicted

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defendant(s) shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2), any and all right, title and interest in any and all property, real or personal, constituting or derived from proceeds the person obtained directly or indirectly as a result of the offense(s) of conviction.

If convicted of any of Counts 29 through 39, the convicted defendant(s) shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all right, title and interests in any and all property, real or personal, which constitutes or is derived, directly or indirectly, from proceeds traceable to the offense(s) of conviction.

If convicted of Count 56, the defendant(s) shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any and all right title and interest in any and all property, real or personal, involved in such offense and/or any property traceable to such property, including but not limited to: \$80,196.79 in funds seized from Wells Fargo Bank Account # 5359277224.

If convicted of Count 57, the defendant(s) shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B) and 18 U.S.C. § , any property constituting or derived from proceeds the person obtained directly or indirectly as a result of the offense of conviction; and shall forfeit, pursuant to 18 U.S.C. § 1028(b) any

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personal property used or intended to be used to commit the offense, including but not limited to: a 2010 E550 Mercedes with VIN: WDDKJ7CB1AF004641.

If any of the property described above is not available for forfeiture as defined by 21 U.S.C. § 853(p)(1), the United States intends to seek the forfeiture of substitute property pursuant to 21 U.S.C. § 853(p)(2) and 28 U.S.C. § 2461(c), including but not limited to:

- (a) \$80,196.79 in funds seized from Wells Fargo Bank Account #5359277224; and
- (b) a 2010 E550 Mercedes with VIN: WDDKJ7CB1AF004641.

A TRUE BILL:

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UNITED STATES ATTORNEY

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FOREPERSON